



Board of Supervisors

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February 1, 2007

California Energy Commission
Dockets Office, MS-4
RE: Docket No. 06-OII-1
1516 Ninth Street
Sacramento, California 95814-5512

RE: Developing Statewide Avian Guidelines for Wind Energy Development

The County of Riverside appreciates the opportunity to comment on the draft guidelines which were developed as part of a lengthy public scoping process that has included one public hearing before the Energy Commission, and eight (8) public workshops held throughout the state. Two of the County's departments (Planning & Environmental Programs) participated in the January 17-18 workshops held at UCR. The County respectfully offers the following comments regarding the latest draft guidelines issued December 22, 2006.

It is our understanding that the proposed voluntary guidelines are in fact "guidelines" and will not be turned into any sort of mandate. The County prefers this type of methodology because of site specific geographic considerations that may be present throughout the state.

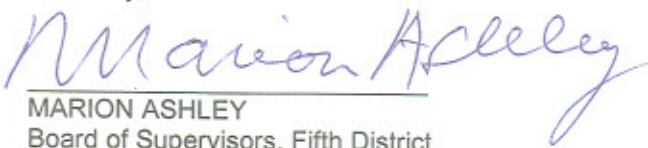
The guidelines will provide a framework to address the mortality issues related to wind energy development. This framework has the potential to enhance the current CEQA analysis, while providing additional certainty to facility operators. The draft guidelines may also protect facilities from CEQA challenges and/or litigation.

The County wants to ensure that local land use authority is maintained throughout the permitting process. While the guidelines do not infer that this will change, the County strongly opposes any attempt to remove itself as the lead agency for the purpose of meeting the appropriate General Plan, zoning and wind energy policy area designations. Local control is an important step in maintaining a transparent public review process.

The County has been at the forefront in adopting environmental mitigation plans (Western Riverside County Multi-Species Habitat Conservation Plan adopted in 2003). In keeping with this progressive stewardship, the County wants to ensure that appropriate mitigation measures are developed based on local environmental conditions in accordance with all applicable local, state and federal rules, regulations and policies.

Thanks again for the opportunity to comment on this significant public policy matter. Should you have any questions or concerns regarding these comments, please contact Gary Christmas of the County Executive Office at (951) 955-1110.

Sincerely,


MARION ASHLEY
Board of Supervisors, Fifth District

cc: Bonnie Garcia, State Assembly